

### **REMARKS**

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Final Office Action dated November 3, 2006 has been received and its contents carefully reviewed.

Claims 1 and 2 were previously canceled. Claims 24-66 were previously withdrawn. Accordingly, claims 3-23 and 67-70 are currently pending. Reexamination and reconsideration are respectfully requested.

In the Office Action, claims 3, 6-8, 10-13, 16, 21 and 67-70 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,358,131 to Sakurai et al. (hereinafter "Sakurai"). Applicant traverses the rejection.

As required in Chapter 2131 of the M.P.E.P., in order to anticipate a claim under 35 U.S.C. §102, the reference must teach every element of the claim. Applicant respectfully submits that Sakurai does not teach every element recited in independent claims 67 and 70.

Claim 67 recites a system for polishing objects comprising, inter alia, a "first transfer robot configured to transfer one of said objects to a polisher in the polishing unit, the second transfer robot being configured to transfer another of said objects to a polisher in the polishing unit, the first and second transfer robots being positioned on a surface such that a center axis of the first transfer robot is offset from a center axis of the second transfer robot, wherein the center axis of the first transfer robot and the center axis of the second transfer robot are transverse to the surface."

More specifically, Sakurai fails to disclose at least "a polishing unit," "the first transfer robot configured to transfer one of said objects to a polisher in the polishing unit" and "the second transfer robot being configured to transfer another of said objects to a polisher in the

polishing unit,” as recited in the claims. On page 2 of the last Office Action, the Examiner interprets carrier 14 as a first transfer robot and another carrier 14 as a second transfer robot. However, Sakurai discloses carriers 14 are present within the polishing chamber 10B. See Figures 1 and 2 of Sakurai. In the present invention, both transfer robots transfer objects to the polishing unit. See Figure 1 of the present invention. That is, the transfer robots of the present invention are not located within the polishing unit.

Accordingly, claim 67 is patentable over Sakurai. Accordingly, Applicant requests that the rejection be withdrawn. Similarly, claims 3, 6-8, 10-13, 16, 21, 68 and 69, which variously depend from claim 67, are also patentable for at least the same reasons as discussed above.

Claim 70 recites a system for polishing surfaces of semi-conductor wafers comprising, inter alia, a “first transfer robot and the second transfer robot both being configured to transfer semi-conductor wafers to a polisher in the polishing unit, wherein the second transfer robot is configured to transfer semi-conductor wafers from the polishing unit to a post-polishing unit wherein the first transfer robot and the second transfer robot cooperatively transfer the semi-conductor wafers to and from the polishing unit to efficiently process the semi-conductor wafers through the polishing unit, wherein the first and second transfer robots are positioned on a surface such that a center axis of the first transfer robot is offset from a center axis of a second transfer robot, the center axis of the first transfer robot and the center axis of the second transfer robot being transverse to the surface.”

As previously discussed, Sakurai fails to disclose at least “the first transfer robot and the second transfer robot both being configured to transfer semi-conductor wafers to a polisher in the polishing unit,” as recited in the claim. Thus, claim 70 is patentable over Sakurai. Accordingly, Applicant requests that the rejection be withdrawn.

Further, claims 4, 5, 14, 15, 17-20 and 23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sakurai in view of U.S. Patent No. 6,503,365 to Kim et al. (hereinafter “Kim”). Applicant traverses this rejection.

As required in Chapter 2143.03 of the M.P.E.P., in order to establish *prima facie* obviousness of the claimed invention, all the limitations must be taught or suggested by the prior art. Applicant submits that Sakurai and Kim, taken singularly or in combination, fail to disclose or suggest all the features recited in claims 4, 5, 14, 15, 17-20 and 23.

Applicant respectfully submits that Kim fails to cure the aforementioned defects associated with the teachings of Sakurai. None of the cited references, singly or in combination, teaches or suggests “the first transfer robot configured to transfer one of said objects to a polisher in the polishing unit” and “the second transfer robot being configured to transfer another of said objects to a polisher in the polishing unit,” as recited in independent claim 67. For at least this reason, claims 4, 5, 14, 15, 17-20 and 23, which variously depend from claim 67, are patentable over the applied references. Accordingly, Applicant requests that the rejection be withdrawn.

Further, claims 9 and 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sakurai in view of U.S. Patent No. 5,948,203 to Wang (hereinafter “Wang”). Applicant traverses this rejection.

Applicant respectfully submits that Wang fails to cure the aforementioned defects associated with the teachings of Sakurai. None of the cited references, singly or in combination, teaches or suggests “the first transfer robot configured to transfer one of said objects to a polisher in the polishing unit” and “the second transfer robot being configured to transfer another of said objects to a polisher in the polishing unit,” as recited in independent claim 67. For at least this reason, claims 9 and 22, which variously depend from claim 67, are patentable over the applied references. Accordingly, Applicant requests that the rejection be withdrawn.

The application is in a condition for allowance and favorable action is respectfully solicited. If for any reason the Examiner believes a conversation with the Applicant's representative would facilitate the prosecution of this application, the Examiner is encouraged to contact the undersigned attorney at (202) 496-7500. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

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Respectfully submitted,

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